

1 Michael C. Ormsby
2 United States Attorney
3 Eastern District of Washington
4 Aine Ahmed
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KEVIN M. ELLISON,

15 Defendant.

16 MJ-12-207

17 Motion for Detention Hearing

18 The United States moves for pretrial detention of Defendant, pursuant to
19 18 U.S.C. § 3142(e) and (f).

- 20 1. Eligibility of Case. This case is eligible for a detention order
21 because the case involves:

- 22 ☐ Crime of violence (as defined in 18 U.S.C. § 3156(a)(4) which
23 includes any felony under Chapter 109A, 110 and 117),
24 ☐ Maximum penalty of life imprisonment or death,
25 ☐ Drug offense with maximum penalty of 10 years or more,
26 ☐ Felony, with two prior convictions in above categories,
27 ☐ Felony that involves a minor victim or that involves the
28 possession or use of a firearm or destructive device (as those
terms are defined in section 921), or any other dangerous
weapon, or involves a failure to register under 18 U.S.C.
section 2250,
☒ Serious risk Defendant will flee, or
☐ Serious risk obstruction of justice.

2. Reason For Detention. The Court should detain Defendant because there is no condition or combination of conditions which will reasonably assure:

☒ Defendant's appearance as required, or

☒ Safety of any other person and the community.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against Defendant under Section 3142(e).

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing:

- At the first appearance, or

☒ After a continuance of three days.

DATED June 14, 2012.

Michael C. Ormsby
United States Attorney

s/Aine Ahmed

Aine Ahmed
Assistant United States Attorney

I hereby certify that on June 14, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System.

s/Aine Ahmed

Aine Ahmed
Assistant United States Attorney